

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:22-CR-00327
)	
[1] CHESTER GALLAGHER)	JUDGE TRAUGER
[2] HEATHER IDONI)	
[3] CALVIN ZASTROW)	
[4] COLEMAN BOYD)	
[5] CAROLINE DAVIS)	
[6] PAUL VAUGHN)	
[7] DENNIS GREEN)	
[8] EVA EDL)	
[9] EVA ZASTROW)	
[10] JAMES ZASTROW)	
[11] PAUL PLACE)	

**DEFENDANTS' MOTION REQUESTING LEAVE OF COURT TO FILE
MEMORANDUM OF LAW IN EXCESS OF TWENTY-FIVE PAGES**

COME NOW Defendants Paul Vaughn, Coleman Boyd, Caroline Davis, Eva Edl, Chester Gallagher, Dennis Green, Heather Idoni, Paul Place, Calvin Zastrow, Eva Zastrow and James Zastrow, by and through counsel, and hereby request leave of court for permission to file a memorandum of law in excess of the twenty-five page limit imposed by Local Rules of Court for the Middle District of Tennessee, Rule L.R. 7.01(a)(2). Filed contemporaneously with this request is the Defendants' Motion to Dismiss Indictment on Grounds of Selective Prosecution; that FACE is an Unconstitutional Content-Based Regulation of Speech; Violation of the Religious Freedom Restoration Act and the Free Exercise Clause; for Lack of Jurisdiction; and for the Personhood of the unborn. Defendants Vaughn, Gallgher, Idoni, Zastrow, Boyd, Davis, and Green also move for dismissal of the conspiracy charge, Count One of the Indictment, on grounds of the lack of civil rights at issue; the Government's motive is to suppress speech; the penalty is disproportionate to

the alleged crime; and to charge a felony conspiracy to commit a misdemeanor FACE crime is contrary to the intent of Congress in enacting FACE. Defendants also include a supporting memorandum of law which contains a comprehensive legal memorandum that is approximately fifty pages in length.

Due to the number of issues that are thoroughly raised in the contemporaneously filed motion and memorandum, and the number of Defendants included in the motion, Defendants request leave of this Court to exceed the twenty-five page limit placed on legal memoranda.

Respectfully submitted,

/s/ Stephen M. Crampton

STEPHEN M. CRAMPTON
Thomas More Society
P.O. Box 4506
Tupelo, MS 38803
(662) 255-9439
scrampton@thomasmoresociety.org

and

LARRY L. CRAIN, Esq.
5214 Maryland Way, Suite 402
Brentwood, TN 37027
(615) 376-2600
larry@crainlaw.legal
www.crainlaw.legal

Attorneys for Paul Vaughn

/s/ Jodie A. Bell. (by permission)

JODIE A. BELL, Esq.
214 Second Avenue North, Suite 208
Nashville, TN 37201
(615)244-1110/ (615) 956-4977

Attorney for Chester Gallagher

/s/ William Conway (by permission)

WILLIAM J. CONWAY, Esq.
214 Second Avenue North, Suite 208
Nashville, TN 37201
(615) 250-5363
wjconway@gmail.com

Attorney for Heather Idoni

/s/ G. Kerry Haymaker (by permission)

G. KERRY HAYMAKER, Esq.
Haymaker & Heroux, P.C.
545 Mainstream Drive, Suite 420
Nashville, TN 37228
(615) 250-0050
haymaker@tennesseedefense.com

and

/s/ Steve C. Thornton (by permission)

STEVE C. THORNTON, Esq.
P.O. Box 16465
Jackson, MS 39236
(601) 982-0313
mail@lawlives.com

Attorneys for Defendant Coleman Boyd

/s/ Heather G. Parker (by permission)

HEATHER G. PARKER
Evans Bulloch Parker PLLC
302 North Spring Street
PO Box 398
Murfreesboro, TN 37133-0398
(615) 896-4154
heatherparker@bfhelaw.com

Attorney for Defendant Caroline Davis

/s/ Manuel B. Russ (by permission)

MANUEL B. RUSS
340 21st Avenue North
Nashville, TN 37203
(615) 329-1919
russben@gmail.com

Attorney for Defendant Dennis Green

/s/ David R. Heroux (by permission)

DAVID R. HEROUX, P.C.
Haymaker & Heroux, P.C.
545 Mainstream Drive, Suite 420
Nashville, TN 37228
(615) 250-0050
heroux@tennesseedefense.com

Attorney for Defendant Eva Ed

/s/ David L. Cooper (by permission)

DAVID L. COOPER
Law Office of David L. Cooper, P.C.
208 Third Avenue, N Suite 300
Nashville, TN 37201
(615) 256-1008
dcooper@cooperlawfirm.com

Attorney for Defendant Eva Zastrow

/s/ Rayburn McGowan, Jr. (by permission)

RAYBURN MCGOWAN, Jr.
8005 Church Street East, Suite 219
Brentwood, TN 37207
(615) 244-7070
mcgowanrayburnjr@bellsouth.net

Attorney for Defendant James Zastrow

/s/ Leonard E. Lucas, III (by permission)

LEONARD E. LUCAS, III
The Law Firm of Leonard Earl Lucas
315 Deadrick St, Suite 1550
Nashville, TN 37238
(301) 204-6498
leonard.lucas@lellawfirm.com

Attorney for Defendant Paul Place

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion to Continue was filed electronically and served on the following by the EF/CME electronic filing system:

JODIE A. BELL
214 Second Avenue North, Suite 208
Nashville, TN 37201
(615)244-1110/ (615) 956-4977
jodie@attorneyjodiebell.com
Attorney for Chester Gallagher

MANUEL B. RUSS
340 21st Avenue North
Nashville, TN 37203
(615) 329-1919
russben@gmail.com
Attorney for Defendant Dennis Green

WILLIAM J. CONWAY
William J. Conway, Esq. P.C.
214 Second Avenue North, Suite 208
Nashville, TN 37201
(615) 260-5364
wjconway@gmail.com
Attorney for Defendant Heather Idoni

DAVID R. HEROUX
Haymaker & Heroux, P.C.
545 Mainstream Drive, Suite 420
Nashville, TN 37228
(615) 250-0050
heroux@tennesseedefense.com
Attorney for Defendant Eva Edl

ROBERT LYNN PARRIS
Robert L. Parris, Attorney at Law
200 Jefferson Avenue, Suite 1500
Memphis, TN 38103
(615) 490-8026
rlp@robertparrisattorney.com
Attorney for Defendant Calvin Zastrow

DAVID L. COOPER
Law Office of David L. Cooper, P.C.
208 Third Avenue, N Suite 300
Nashville, TN 37201
(615) 256-1008
dcooper@cooperlawfirm.com
Attorney for Defendant Eva Zastrow

G. KERRY HAYMAKER
Haymaker & Heroux, P.C.
545 Mainstream Drive. Suite 420
Nashville, TN 37228
(615) 250-0050
haymaker@tennesseedefense.com
Attorney for Defendant Coleman Boyd

RAYBURN McGOWAN, Jr.
8005 Church Street East, Suite 219
Brentwood, TN 37207
(615) 244-7070
mcgowanrayburnjr@bellsouth.net
Attorney for Defendant James Zastrow

STEVE C. THORNTON, Esq.
P.O. Box 16465
Jackson, MS 39236
(601) 982-0313
mail@lawlives.com
Attorney for Defendant Coleman Boyd

LEONARD E. LUCAS, III
The Law Firm of Leonard Earl Lucas
315 Deadrick St, Suite 1550
Nashville, TN 37238
(301) 204-6498
leonard.lucas@lellawfirm.com
Attorney for Defendant Paul Place

HEATHER G. PARKER
Evans Bulloch Parker PLLC
302 North Spring Street
PO Box 398
Murfreesboro, TN 37133-0398
(615) 896-4154
heatherparker@bfhelaw.com
Attorney for Defendant Caroline Davis

LARRY LAMONT CRAIN
5214 Maryland Way, Suite 402
Brentwood, TN 37207
(615) 376-2600
larry@crainlaw.legal
Attorney for Defendant Paul Vaughn

STEPHEN M. CRAMPTON
Thomas More Society
P.O. Box 4506
Tupelo, MS 38803
(662) 255-9439
scrampton@thomasmoresociety.org
Attorney for Defendant Paul Vaughn

AMANDA J. KLOPF
U.S. Attorney's Office (Nashville)
719 Church Street, Suite 3300
Nashville, TN 37203
(615) 736-5151
amanda.klopf@usdoj.gov
Representing USA

SANJAY PATEL
Department of Justice
150 M Street NE
Washington, DC 20002
(202) 598-1018
Sanjay.patel@usdoj.gov
Representing USA

NIKHIL A. RAMNANEY
Department of Justice
150 M Street NE
Washington, DC 20002
(202) 598-1018
nikhil.ramnaney@usdoj.gov
Representing USA

This the 8th day of March, 2023.

/s/ Stephen M. Crampton
STEPHEN M. CRAMPTON